

EXHIBIT B

In the Matter Of:

JOHNSON vs FORD MOTOR COMPANY

NICHOLAS J. ROWAN, SR.

October 03, 2019

Prepared for you by



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<p>1 as why I'm here.</p> <p>2 Q So it's your testimony, sir, that you never sent</p> <p>3 DeAnna any sexual texts?</p> <p>4 A Yes, that is my testimony.</p> <p>5 Q You never asked her to show you her breasts or</p> <p>6 pictures of her breasts?</p> <p>7 A That is my testimony.</p> <p>8 Q Did she ever send you pictures of her breasts?</p> <p>9 A No.</p> <p>10 Q Have you used the phrase flash pic?</p> <p>11 A No. I don't even know what that means.</p> <p>12 Q You don't know what flash pic means?</p> <p>13 A No, I don't.</p> <p>14 Q Did you call DeAnna a chocolate Jolly Rancher?</p> <p>15 A No.</p> <p>16 Q Or a Jolly Rancher with legs?</p> <p>17 A No.</p> <p>18 Q Did she ask you what you meant with respect to a</p> <p>19 comment about a Jolly Rancher and you said she was</p> <p>20 a chocolate treat you wanted to lick and suck on?</p> <p>21 A Absolutely not.</p> <p>22 Q With respect to taking a picture of Ms. Johnson</p> <p>23 from behind what is your position on that? You did</p> <p>24 that or did not do that?</p> <p>25 A She --</p>	<p>1 career.</p> <p>2 Q You made comments about you knew she had pierced</p> <p>3 nipples and you could see them through her shirt?</p> <p>4 A No.</p> <p>5 Q Is that what you told her?</p> <p>6 A No. The only comment was ever made regarding that</p> <p>7 was her telling people, yeah, they're not a bad</p> <p>8 thing to have.</p> <p>9 Q Did you bump her in the chest area and ask her if</p> <p>10 that hurt her piercing?</p> <p>11 A No.</p> <p>12 Q Did you learn that someone had using a label gun</p> <p>13 left a label on her desk that said one silver, one</p> <p>14 gold?</p> <p>15 A No.</p> <p>16 Q Are you denying that you were responsible for</p> <p>17 that?</p> <p>18 A Yeah, I'm not sure what that refers to.</p> <p>19 Q Well, did you ever say to DeAnna something to the</p> <p>20 effect of you knew she had one silver and one gold</p> <p>21 nipple ring?</p> <p>22 A No.</p> <p>23 Q Did you grab her breasts?</p> <p>24 A No.</p> <p>25 Q Did you ever apologize to her for grabbing her</p>
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<p>1 MR. DAVIS: Asked and answered.</p> <p>2 Go ahead.</p> <p>3 A She was at my desk and I was on the other side of</p> <p>4 the line and I took a picture and said uh-huh. And</p> <p>5 then I don't remember the comment that I made to</p> <p>6 her when I showed it to her, and I said, oh, look,</p> <p>7 in my stuff again.</p> <p>8 Q Why were you taking a picture of her from behind?</p> <p>9 A Because I was behind her and she was at my desk.</p> <p>10 Q Why would you take a picture?</p> <p>11 A Just to show her, I said, look, you're at my desk</p> <p>12 again getting into my stuff. We had a very good</p> <p>13 relationship as far as I knew. We had playful</p> <p>14 banter back and forth about work stuff.</p> <p>15 Q Did you ever text her and use the word come, but</p> <p>16 spell it c-u-m?</p> <p>17 A No.</p> <p>18 Q Did you ever complain to her that she wasn't</p> <p>19 sending you the nude pictures you had asked for?</p> <p>20 A No.</p> <p>21 Q Did you have any discussions with DeAnna about</p> <p>22 nipple piercing?</p> <p>23 A She had mentioned one time with -- there was me</p> <p>24 there, Shaun there, somebody else, I'm not sure who</p> <p>25 it was, but she had mentioned because of her rap</p>	<p>1 breasts?</p> <p>2 A No.</p> <p>3 Q Why would you have done that --</p> <p>4 A I --</p> <p>5 Q -- or you just never did it?</p> <p>6 A No, I didn't. I -- and I even have the text</p> <p>7 message. We were in my cubicle one time and I had</p> <p>8 bumped her leg and I felt bad about bumping her leg</p> <p>9 and I apologized for that because I remember</p> <p>10 apologizing for that and I'm like --</p> <p>11 Q Bumped her leg with what part of your body?</p> <p>12 A Just my arm.</p> <p>13 Q Why would you need to apologize for bumping her</p> <p>14 leg with your arm?</p> <p>15 A Well, it was like her thigh and that's just, you</p> <p>16 know, too close for comfort for me so I said, oh,</p> <p>17 sorry.</p> <p>18 Q Then you followed up with a text or not?</p> <p>19 A Yeah. And she had written back something like a</p> <p>20 slip is a slip. I still have it on me word for</p> <p>21 word, but it said something like, oh, a slip is a</p> <p>22 slip or something like that.</p> <p>23 Q Did DeeDee tell you she was going to report you to</p> <p>24 HR?</p> <p>25 A Never came up. Until the day I got walked out I</p>

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<p>1 referring to her itching from a potato sack because</p> <p>2 you got potato bugs and all sorts of stuff like</p> <p>3 that so, guess what, take a shower, get rid of the</p> <p>4 itching.</p> <p>5 Q Look at Page 44. Do you know why you would text</p> <p>6 her whatever, dot, dot, dot, tease, dot, dot, dot?</p> <p>7 A In that reference right there?</p> <p>8 Q Yes.</p> <p>9 A No, I don't even know what that was just about,</p> <p>10 whatever, tease. I have no idea.</p> <p>11 Q Do you think Deanna Johnson was a tease?</p> <p>12 A No.</p> <p>13 Q What are these photos of on 44 and 45 if you can</p> <p>14 make them out?</p> <p>15 A It's a pillar at work. There's a water line right</p> <p>16 there and there's a sign at the top that says fire</p> <p>17 extinguisher. That's what's in dead center so</p> <p>18 that's what I'm thinking it had something to do</p> <p>19 with, yeah, because the next one shows the water.</p> <p>20 There should be a fire extinguisher hanging right</p> <p>21 there and there's no fire extinguisher.</p> <p>22 So probably for the safety committee, I run</p> <p>23 around taking pictures, hey, we should have a fire</p> <p>24 extinguisher here and that kind of stuff so that</p> <p>25 way before the next shift gets there they could get</p>	<p>1 Q So what is this referencing? She's saying are you</p> <p>2 going in at 3:21 p.m. You respond are you</p> <p>3 inviting, oh, dot, dot, dot, wait, dot, dot, dot,</p> <p>4 work, dot, dot, dot, no?</p> <p>5 A That was --</p> <p>6 Q What does that refer to?</p> <p>7 A That was probably another playful banter. I can</p> <p>8 see that.</p> <p>9 Q Regarding sex?</p> <p>10 A It could be, but I mean are you inviting -- to me</p> <p>11 I'm saying are you inviting because they don't pay</p> <p>12 me to come in unless I get paid. And then I said,</p> <p>13 oh, wait, work, no. So my first are you inviting</p> <p>14 was to work because they don't just let us come in</p> <p>15 at any time so, oh, you're inviting me to come to</p> <p>16 work.</p> <p>17 Q So is that a sexual reference?</p> <p>18 A I think the last one was. I think I did, but,</p> <p>19 like I said, that was one of the few playful</p> <p>20 banter between us right there, I believe so.</p> <p>21 Q Look at 62. This page includes a photo of you and</p> <p>22 another woman --</p> <p>23 A Yes.</p> <p>24 Q -- and a woman, correct?</p> <p>25 A Yes.</p>
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<p>1 fire extinguishers out there for safety reason.</p> <p>2 Q Turn to 48.</p> <p>3 A Okay.</p> <p>4 Q At 4:12 a.m. or 4:16 a.m., depending on how you</p> <p>5 read this, you're texting DeAnna Johnson cum,</p> <p>6 c-u-m, see me upstairs. Do you see that?</p> <p>7 A I do.</p> <p>8 Q You testified under oath a few minutes ago that</p> <p>9 you never would have texted anything like that to</p> <p>10 my client, correct?</p> <p>11 A And that is correct.</p> <p>12 Q So how is that we see it here in black and white?</p> <p>13 A Once again, I don't know, but I would not use that</p> <p>14 spelling. I know what that would refers to, and,</p> <p>15 no, I don't use that kind of spelling.</p> <p>16 These are the ones that I have here. This is</p> <p>17 about I'm on my way into work to see if I have that</p> <p>18 paper to see what he's talking about.</p> <p>19 Q What page are you on?</p> <p>20 A I'm sorry. This is 52.</p> <p>21 Q So you should have everything from here on out,</p> <p>22 correct?</p> <p>23 A I believe so.</p> <p>24 Q Do you have 51 in your phone?</p> <p>25 A 51, yes.</p>	<p>1 Q Do you know who that woman is?</p> <p>2 A Mary her name is. She's another supervisor I was</p> <p>3 training. She was actually on another shift and</p> <p>4 she came into this shift to train.</p> <p>5 Q Is that Mary Fletcher?</p> <p>6 A I believe Fletcher, yes.</p> <p>7 Q Did you ever tell DeAnna that you were having sex</p> <p>8 with Ms. Fletcher?</p> <p>9 A No, absolutely not.</p> <p>10 Q Why would you send her a picture of you and</p> <p>11 Ms. Fletcher?</p> <p>12 A Because it says right there leave me at Mary's</p> <p>13 Mercy.</p> <p>14 Q Meaning what?</p> <p>15 A Meaning that she was working with me for that day.</p> <p>16 It was, oh, look, left me at her mercy. Because</p> <p>17 she wasn't there, she was gone that day so it's</p> <p>18 like, oh, look, you left me at Mary's mercy.</p> <p>19 Nothing wrong with that. I see nothing wrong with</p> <p>20 that.</p> <p>21 Q Were you ever hoping that DeAnna would send you</p> <p>22 pictures?</p> <p>23 A No.</p> <p>24 Q Take a look at 66. It looks like DeAnna has sent</p> <p>25 you -- and then this looks like November 17, 2018,</p>